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9 *Attorneys for Pennymac Loan Services, LLC*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 TIM DAHAR,

13 Plaintiff,

14 v.

15 PENNYMAC LOAN SERVICES, LLC and
16 NATIONAL DEFAULT SERVICING CORP.,

17 Defendants.
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Case No.: 2:23-cv-01020-CDS-MDC

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO (1) RESPOND
TO AMENDED COMPLAINT AND
(2) SUBMIT DISCOVERY PLAN AND
SCHEDULING ORDER**

(FIRST REQUEST)

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Tim Dahar and Pennymac Loan Services, LLC agree that Pennymac may have an additional fourteen (14) days, up to and including **March 28, 2024**, to file its response to Mr. Dahar's amended complaint, which is currently due on March 14, 2024. The amended complaint, which Mr. Dahar timely filed on February 23, 2024, was entered and served on February 29, 2024. ECF No. 26.

The court granted Pennymac's unopposed motion to stay discovery on September 14, 2023. ECF No. 20. The court ordered at that time that the parties "must file a new discovery plan and scheduling order 21 days after the decision on the motion to dismiss, if claims are still pending." *Id.* Mr. Dahar's claims were dismissed without prejudice and with leave to amend, so long as he filed the amended complaint by February 23, 2024. Mr. Dahar and Pennymac further agree that the parties may have until **April 4, 2024**, to submit a discovery plan and scheduling order.

Good cause exists to grant the requested extensions. The attorneys representing Pennymac in this action will all be out of the jurisdiction the week of March 11, 2024. This is the parties' first request for an extension, and it is not intended to cause any delay or prejudice to any party.

DATED this 8th day of March, 2024.

AKERMAN LLP <u>/s/ Paige L. Magaster</u> ARIEL E. STERN, ESQ. Nevada Bar No. 8276 NATALIE L. WINSLOW, ESQ. Nevada Bar No. 12125 PAIGE L. MAGASTER, ESQ. Nevada Bar No. 15557 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 <i>Attorneys for Pennymac Loan Services, LLC</i>	<u>/s/ Tim Dahar</u> TIM DAHAR 4540 San Rafael Avenue Las Vegas, NV 89120
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ORDER

IT IS SO ORDERED:


Maximiliano D. Couvillier III
UNITED STATES MAGISTRATE JUDGE
 2:23-cv-01020-CDS-MDC
 DATED: **March 11, 2024**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of March, 2024, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO (1) RESPOND TO AMENDED COMPLAINT AND (2) SUBMIT DISCOVERY PLAN AND SCHEDULING ORDER**, in the following manner:

☐ **(ELECTRONIC SERVICE)** Pursuant to FRCP 5(b), the above referenced document was electronically filed on the date hereof with the Clerk of the Court for the United States District Court by using the Court's CM/ECF system and served through the Court's Notice of electronic filing system automatically generated to those parties registered on the Court's Master E-Service List.

☒ **(UNITED STATES MAIL)** By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed below at their last-known mailing addresses, on March 8, 2024.

Tim Dahar
4540 San Rafael Avenue
Las Vegas, NV 89120

☐ **(PERSONAL SERVICE)** By causing to be personally delivered a copy of the above-referenced document to the person(s) listed below:

☒ **(EMAIL)** By emailing a true and correct copy of the above-referenced document to the person(s) listed below on March 8, 2024:

tim.dahar@gmail.com

I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made

/s/ Patricia Larsen
An employee of AKERMAN LLP